

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PATRIARCH PARTNERS
AGENCY SERVICES, LLC

*Plaintiff-
Counterclaim Defendant,*

v.

ZOHAR CDO 2003-1, LTD.,
ZOHAR II 2005-1, LTD., and
ZOHAR III, LTD.,

*Defendants-
Counterclaim Plaintiffs,*

—and—

ZOHAR CDO 2003-1, LLC,
ZOHAR II 2005-1, LLC, and
ZOHAR III, LLC,

Defendants.

Case No. 16-cv-4488(VM)(KHP)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Local Civil Rule 56.1 Statement of Undisputed Material Facts, and the Declaration of Jonathan E. Pickhardt and exhibits thereto, Defendant-Counterclaim Plaintiff David Dunn, as Trustee for the Zohar Litigation Trust-A (the “Trust”), will move this Court, at a date and time to be determined by this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York, 10007, pursuant to Federal Rule of Civil Procedure 56, to dismiss in its entirety with prejudice Plaintiff-Counterclaim Defendant Patriarch Partners Agency Services, LLC’s (“PPAS”) Count II, and to grant summary judgment as to PPAS’s liability on the Trust’s Counterclaim Count III.

Dated: July 18, 2024
New York, New York



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